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***VIA E-MAIL and ECFS***

March 1, 2018

Kris Monteith (kris.monteith@fcc.gov)  
Wireline Competition Bureau  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**Re: CenturyLink Broadband Deployment Semi-Annual Report  
WC Docket No. 10-110**

Dear Ms. Monteith:

Pursuant to the Federal Communications Commission's *Memorandum Opinion and Order*, WC Docket No. 10-110, 26 FCC Rcd 4194, Appendix C, item I (rel. March 18, 2011) (Merger Commitments), attached is CenturyLink's Semi-Annual Report on Broadband Deployment for data as of December 31, 2017. This Report includes the percentage of living units within the legacy Qwest territory to which CenturyLink offers broadband services capable of delivering at least 1.5 Mbps, 5 Mbps, 12 Mbps and 40 Mbps downstream, and the breakdown at each level between rural and non-rural areas.

To better account for the text of the Merger Commitments and the interplay between those commitments and the Commission's Connect America Fund (CAF) program, these reported percentages reflect certain methodological changes:

- Living units that have access to CenturyLink broadband services with actual throughput of at least 4 Mbps downstream and 1 Mbps upstream have been included in the count of living units with access to at least 5 Mbps downstream.
  - CenturyLink currently markets broadband service with downstream speeds of up to 12 Mbps for a price that does not vary for service up to that capacity. Customers can determine the actual speed available at their location by talking to a customer service representative or using CenturyLink's online tool.
  - Consistent with CenturyLink's commitment that "at the level identified as at least 5 Mbps downstream, actual throughput speeds will be at least 4 Mbps

downstream,”<sup>1</sup> CenturyLink customers have access to broadband with actual throughput of at least 4 Mbps downstream and 1 Mbps upstream to the percentage of living units identified in the attached chart.

- Living units covered by CenturyLink’s commitments in the CAF I and CAF II programs have been excluded from all the percentage calculations.
  - CenturyLink’s build-out commitments under the CAF programs are “independent” of its commitments under the *CenturyLink/Qwest Merger Order*.<sup>2</sup>
  - The CAF commitments are subject to separate speed requirements, milestones, and penalty provisions, reflecting the Commission’s priorities at the time those programs were established.

Sincerely,

/s/ Glenda Weibel

Attachment

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<sup>1</sup> Merger Commitments at n.3.

<sup>2</sup> See *In the Matter of Connect America Fund*, et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17720-21 ¶ 146 n. 233 (2011) (*USF/ICC Transformation Order*) subsequent history omitted.

# Broadband Expansion Semi-Annual Report

	% LUs 7 Years from Merger Closing Date (4/1/18)	% LUs as of 12/31/17	Rural as of 12/31/17	Non-Rural as of 12/31/17
	objective	actual	actual	actual
<b>Living Units with Access to at Least 1.5 Mbps Downstream</b>	<b>92.7%</b>	<b>92.6%</b>	<b>85.7%</b>	<b>95.9%</b>
<b>Living Units with Access to at Least 5 Mbps Downstream</b>	<b>78.8%</b>	<b>82.2%</b>	<b>70.6%</b>	<b>87.7%</b>
<b>Living Units with Access to at Least 12 Mbps Downstream</b>	<b>60.0%</b>	<b>66.0%</b>	<b>52.0%</b>	<b>72.7%</b>
<b>Living Units with Access to at Least 40 Mbps Downstream</b>	<b>30.0%</b>	<b>45.8%</b>	<b>26.2%</b>	<b>55.2%</b>

- All counts reflect Legacy-Qwest geography only
- The numbers shown in this chart reflect the percentages of households served by DSLAMs that are capable of providing the specified broadband speeds. It should be noted that, at any given time, a small percentage of these households in some areas may not be able to obtain CenturyLink broadband services on demand, due to capacity constraints in the network.